

Presented to:

Seals and Packings, Inc. – Burly Seals
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Burly Seal Self-Implementing PCB Cleanup and Disposal Work Plan Addendum

May 2012

ENVIRONMENTAL RESOURCES MANAGEMENT

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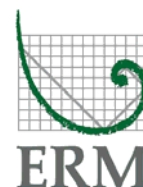


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Environmental Resources Management (ERM) and Seals and Packings, Inc. – Burly Seal Products Co. (Burly Seal) submitted a Self-Implementing PCB Cleanup and Disposal Work Plan (Work Plan) to the EPA in May 2011. The plan presented proposed actions to clean up PCB impacts at the Burly Seal facility located at 1865 West D Avenue, Building 604, in the Utah Industrial Depot (UID) in Tooele, Utah. This Self-Implementing PCB Cleanup and Disposal Work Plan Addendum (Addendum) has been prepared to summarize work completed to date, describe results from samples taken during December 2011, and describe remedial actions that will occur beyond those described in the original Work Plan based on the December 2011 sample results. This Addendum also provides a schedule for the additional work as requested by EPA.

ERM and Americon mobilized and began on-site work on November 10, 2011. From November 10, 2011 through December 14, 2011, Americon performed the following work under the supervision of ERM:

- They placed miscellaneous debris from the Press Room and Boiler Room that was assumed to be contaminated with PCBs into roll-off bins for disposal at the Grassy Mountain Facility. Miscellaneous debris included small buckets and containers of oil absorbents, employee work platforms, shelving, boxes, tools, wooden pallets, etc.
- They drained oil and oily water from hydraulic presses, piping, reservoirs, pans beneath presses, and Compressor Room oil/water separator; and containerized liquids in labeled drums for disposal by incineration at the Aragonite incinerator. Four drums of oily absorbent that were staged by Burly Seal in the Boiler Room prior to the cleanup work were also sent to Aragonite for incineration.
- They disconnected hydraulic presses and reservoirs; cut electrical conduit and piping.
- They placed several small hydraulic presses, the oil/water separator, and piping (cut to length) into roll-off bins for disposal at the Grassy Mountain Facility.
- They placed larger hydraulic presses, reservoirs, pumps, and I-beams onto flatbed trucks for disposal at the Grassy Mountain Facility.
- They transported the MP Environmental bin to the Grassy Mountain Facility for disposal of the contents and returned the bin to Burly Seal for cleaning.
- They cleaned the Press Room and Boiler Room floors.
- Water/detergent from the floor cleaning was containerized in labeled drums for disposal by incineration at the Aragonite incinerator.

2.1

EQUIPMENT AND MATERIALS REMOVED

The table below provides a summary of the materials that were removed by flatbed truck. A schematic showing the press system equipment and configuration prior to removal is included as Appendix A.

Table 1 Materials Removed from Burly Seal by Flatbed

Equipment Description	Approx. Weight (lbs)	Notes
Equipment disposed on 11/18/2011 under manifest number 004420420FLE (total manifest weight was 18,877 kilograms)		
Press A1	4,130 (w/reservoir)	Press with separate reservoir
Press A2	4,130 (w/reservoir)	Press with separate reservoir
Press A3	4,130 (w/reservoir)	Press with separate reservoir
Press A4	4,130 (w/reservoir)	Press with separate reservoir
Press A5	4,130 (w/reservoir)	Press with separate reservoir
Press A6	4,130 (w/reservoir)	Press with separate reservoir
Press G4	4,900	
Press G5	4,900	
Press G6	4,900	
Equipment disposed on 11/18/2011 under manifest number 004420421FLE (total manifest weight was 17,525 kilograms)		
Press B1	4,600	
Press B2	4,600	
Press B3	4,600	
Press B4	4,600	
Press F1	5,000	
Press F2	5,000	
Press F3	5,000	
Press F4	5,000	
Press G1	4,900	
Press G2	4,900	
Press G3	4,900	
Equipment disposed on 11/30/2011 under manifest number 004420418FLE (total manifest weight was 14,848 kilograms)		
Press C1	11,000	
Press C2	11,000	

Equipment Description	Approx. Weight (lbs)	Notes
Press C3	11,000	
Equipment disposed on 11/30/2011 under manifest number 004420413FLE (total manifest weight was 8,382 kilograms)		
South Reservoir	4,000	Boiler room
A reservoir platform	Unknown	
Press H1	12,000	
Equipment disposed on 11/30/2011 under manifest number 004420417FLE (total manifest weight was 9,886 kilograms)		
Press H2	12,000	
Press H3	12,000	
Equipment disposed on 12/1/2011 under manifest number 004420414FLE (total manifest weight was 16,980 kilograms)		
Press D2	12,500	
Press D3	12,500	
Press D4	12,500	
Equipment disposed on 12/2/2011 under manifest number 004420416FLE (total manifest weight was 8,097 kilograms)		
Two I-beams	Unknown	From beneath C and D presses
Press D1	12,500	
North Reservoir (larger)	1,500	Boiler room
North Reservoir (smaller)	1,000	Boiler room
Hydraulic Oil Fill Pump	1,500	Boiler room

Smaller equipment, piping, employee work platforms, shelving, absorbents, and other miscellaneous materials were placed into 20 or 25 cubic yard roll-off bins for disposal. The table below provides a summary of roll-off bins shipped to Grassy Mountain.

Table 2 Roll-off Bins Shipped from Burly Seal

Date	Manifest Number	Weight	Notes
11/15/2011	004420412FLE	2,186 kilograms	Miscellaneous materials
11/15/2011	004420411FLE	1,814 kilograms	Miscellaneous materials
11/16/2011	004420409FLE	3,175 kilograms	This roll-off bin contained small hydraulic presses E1-E4 and other miscellaneous materials

Date	Manifest Number	Weight	Notes
11/18/2011	004420403FLE	2,087 kilograms	Miscellaneous materials
11/18/2011	004420408FLE	1,823 kilograms	Miscellaneous materials
11/22/2011	004420407FLE	3,000 kilograms	Miscellaneous materials
11/30/2011	004420410FLE	2,700 kilograms	Miscellaneous materials
11/30/2011	004420405FLE	1,461 kilograms	Miscellaneous materials
12/7/2011 (Note 1)	004420406FLE	2,232 kilograms	Miscellaneous materials
12/16/2011	004420404FLE	1,297 kilograms	Miscellaneous materials
12/16/2011	004420426FLE	1,615 kilograms	This roll-off contained the Oil/Water Separator from the compressor room and other miscellaneous materials
12/28/2011	004420427FLE	2,549 kilograms	Miscellaneous materials

Note 1: This roll-off bin was the MP Environmental bin that was shipped to Grassy Mountain for disposal of its contents and returned to Burly Seal for cleaning.

All of the drums sent off site were shipped on December 2, 2011 under manifest number 004420433FLE. The table below provides a summary of drums shipped to Aragonite for incineration:

Table 3 *Drums Shipped to Aragonite for Incineration*

Clean Harbors Profile Number	Description	Number of Drums Shipped
CH533866	Oily water with sediment (liquid)	24
CH536809	Oily absorbents, floor dry with PCBs (solid)	4
CH532709	PCB-contaminated oil (liquid)	12
CH533055	Oily water (liquid)	1

2.2

FLOOR CLEANING

The Press Room and Boiler Room floors were cleaned from December 9 through December 13, 2011 using a pressure washer and water with a detergent. On December 14, 2011, ERM collected several “test” samples from the floor. Because the test samples were not collected using the Work Plan confirmation sampling grid, these samples were only to be

used to gauge the effectiveness of the initial cleaning, and not as confirmation samples. Based on the test sample results, it appeared that a portion of the Press Room (in the northeast of the room near the office) could potentially meet the cleanup standard of one ppm; the remainder of the Press Room was unlikely to meet the cleanup level, even with additional cleaning. The Boiler Room appeared likely to meet the cleanup level if additional cleaning were performed.

Based on the test results, the full confirmation sampling grid was used to perform confirmation sampling on the northeast portion of the Press Room floor near the office on December 27, 2011. Based on these results, as described in Section 3, it was determined that the floor area does not meet the cleanup level.

The Boiler Room was recleaned on December 27, 2011. The full Work Plan confirmation sampling grid was used to perform confirmation sampling by ERM on the entire Boiler Room floor on December 30, 2011. Based on these results, as described in Section 3, it was determined that a portion of the floor in the Boiler Room meets the cleanup level.

The wash water was collected and containerized for disposal by incineration at Aragonite.

2.3

MP ENVIRONMENTAL BIN

The MP Environmental bin had been used by Burly Seal to accumulate oily wastes prior to the cleanup. As part of the cleanup, the MP Environmental bin was transported to the Grassy Mountain Facility to dispose of the contents, and the bin was returned to Burly Seal for cleaning.

The bin was originally cleaned by Americon on December 13, 2011 by use of a pressure washer and water with a detergent. The wash water was collected for disposal by incineration at Aragonite. Confirmation sampling was conducted by ERM on December 14, 2011, by wipe sampling four locations on the bin interior surface in accordance with 40 CFR 761 Subpart P. Sample results are shown on Table 4. The arithmetic mean (composite) of the sample results was above the high-occupancy cleanup standard of 10 micrograms per 100 square centimeters ($\mu\text{g}/100\text{ cm}^2$) of surface area. The bin was recleaned on December 27, 2011 and resampled on December 30, 2011. Once again, the results did not meet the high-occupancy cleanup standard. Based on the location of the highest result, and visual evidence of residual dirt on the bin door interior surface, the door was recleaned on February 17, 2012 using vigorous hand

scrubbing. The four confirmation samples taken on February 17th and February 21st (the lab accidentally destroyed one of the samples taken on the 17th) showed that the door sample met the cleanup criteria, but two other samples and the arithmetic mean exceeded the standard. The bin interior was cleaned again on April 23, 2012. Based on the ability of the vigorous scrubbing to remove dirt and PCBs from the corroded interior surface of the bin door, the entire bin interior was cleaned in this manner. Verification samples were taken by ERM on April 23, 2012.

The four verification samples collected on April 23, 2012 showed one sample result ($11 \mu\text{g}/100 \text{ cm}^2$) slightly above the high-occupancy cleanup standard; however, the arithmetic mean of the sample results was $4.0 \mu\text{g}/100 \text{ cm}^2$. The high-occupancy cleanup standard was chosen as a very conservative measure of cleanup success. As personnel would generally not be expected to enter the roll-off bin, we believe the low-occupancy cleanup standard of $100 \mu\text{g}/100 \text{ cm}^2$ would also be an appropriate cleanup standard. The sampling methodology in 40 CFR 761 Subpart P allows the compositing of a maximum of 10 adjacent samples for large, nearly flat surfaces, and states that the composite measurement represents an arithmetic mean of the composited samples.

Based on the fact that all of the verifications samples were well below the low-occupancy cleanup standard, and the arithmetic mean of the final verification sample results was below the high-occupancy cleanup standard, ERM requested approval from the EPA to release the bin for return to MP Environmental. The EPA provided approval via email on May 4, 2012, and the bin was subsequently returned to MP Environmental.

Table 4 *MP Environmental Bin Wipe Sample Results*

Date	Sample ID	Result (ug/100cm2)
12/14/11	MP1	25
12/14/11	MP2	1.7
12/14/11	MP3	10
12/14/11	MP4	5.2
Arithmetic mean		10.5
12/30/11	MP5	39
12/30/11	MP6	1.4
12/30/11	MP7	1.4
12/30/11	MP8	9.3
Arithmetic mean		12.8
2/21/12	MP9	0.52
2/17/12	MP10	25
2/17/12	MP11	3.8
2/17/12	MP12	19
Arithmetic mean		12.1
4/23/12	MP13	1.1
4/23/12	MP13	0.49
4/23/12	MP14	3.4
4/23/12	MP16	11
Arithmetic mean		4.0

This section summarizes the results of sampling performed by the EPA and ERM during December 2011 and provides recommendations for next steps.

The EPA performed sampling at Burly Seal on December 20, 2011. ERM collected samples on December 27 and 30, 2011. The results, with a brief description of the type and location of each sample, are presented on Table 4. Table 4 does not include the MP Environmental bin sampling results, which are discussed in Section 2.3. Attachment 1 provides maps and photographs to better identify sample locations.

Table 5 *December 2011 Sample Results*

Sample ID	Sampled by	Date	Location/Description	Result (ppm)
OS-1	EPA	12/20/2011	Dirt from seam in concrete; outside near compressor room by former tote storage	21.0
OS-2	EPA	12/20/2011	Dirt from seam in concrete; outside near boiler room roll-up door	114.0
OS-3	EPA	12/20/2011	Dirt from area between parking lot and railroad tracks	500.0
PR-P	EPA	12/20/2011	Debris from base of pillars in press room	72.4
BRD1	EPA	12/20/2011	Dirt from drain sump in boiler room closest to roll-up door	5.62
BRD2	EPA	12/20/2011	Debris (appeared to be rusty metal) from inside floor drain in middle of boiler room	20.1
CR-1	EPA	12/20/2011	Oil and absorbent from floor of compressor room	55.2
CR-2	EPA	12/20/2011	Debris (appeared to be dirt and absorbent) from inside floor drain in compressor room	48.4
PRNE-1	ERM	12/27/2011	Composite sample of concrete from press room floor	8.2
PRNE-2	ERM	12/27/2011	Composite sample of concrete from press room floor	16
PRNE-3	ERM	12/27/2011	Composite sample of concrete from press room floor	1.5

Sample ID	Sampled by	Date	Location/Description	Result (ppm)
PRNE-4	ERM	12/27/2011	Composite sample of concrete from press room floor	6.3
PRNE-5	ERM	12/27/2011	Composite sample of concrete from press room floor	71
PRNE-6	ERM	12/27/2011	Composite sample of concrete from press room floor	0.97
PRNE-7	ERM	12/27/2011	Composite sample of concrete from press room floor	4.1
PRNE-8	ERM	12/27/2011	Composite sample of concrete from press room floor	0.35
PRNE-9	ERM	12/27/2011	Composite sample of concrete from press room floor	0.37
PRNE-10	ERM	12/27/2011	Composite sample of concrete from press room floor	0.15
TS-1	ERM	12/27/2011	Composite sample of concrete from parking lot former tote storage area	2.7
CRA	ERM	12/27/2011	Oil and absorbent from floor of compressor room	57
BR-4	ERM	12/30/2011	Composite sample of concrete from boiler room floor	4.6
BR-5	ERM	12/30/2011	Composite sample of concrete from boiler room floor	6.9
BR-6	ERM	12/30/2011	Composite sample of concrete from boiler room floor	3.6
BR-7	ERM	12/30/2011	Composite sample of concrete from boiler room floor	5.6
BR-8	ERM	12/30/2011	Composite sample of concrete from boiler room floor	3.5
BR-9	ERM	12/30/2011	Composite sample of concrete from boiler room floor	0.48
BR-10	ERM	12/30/2011	Composite sample of concrete from boiler room floor	0.31
BR-11	ERM	12/30/2011	Composite sample of concrete from boiler room floor	1.3
BR-12	ERM	12/30/2011	Composite sample of concrete from boiler room floor	0.79
SW-1	ERM	12/30/2011	Composite sample of concrete from parking lot in area of former MP bin storage	0.30

3.1

PRESS ROOM CONCRETE FLOOR

ERM collected and composited concrete samples from the northeast portion of the Press Room floor following the floor cleaning by Americon. The results show that the area closest to the office/roll-up door meets the cleanup goal; however, the portion of the floor more directly under the press equipment does not meet the cleanup goal, with results ranging from 1.5 to 71 ppm.

The EPA collected samples of debris at the base of the pillars in the Press Room. The debris contained 72.4 ppm PCBs.

Recommendation: We plan to remove the portion of the slab that does not meet the cleanup goal. As described in the original Work Plan, we still intend to remove approximately 3-4 cubic yards of soil from beneath the slab seams, where the seams have allowed oil containing PCBs to migrate into the underlying soil. Once the slab is removed, any soil with visual evidence of oil will also be removed. The debris at the base of the pillars sampled by the EPA will be removed during the floor removal.

Because the affected area of the concrete slab will be removed in its entirety, ERM will perform verification sampling of the underlying soil using the 1.5 meter grid described in Subpart O. Potential migration of PCBs through the slab would be most likely occur along the slab seams. For that reason, the verification sampling will focus on areas beneath the slab seams as shown on Figure 3.

3.2

BOILER ROOM CONCRETE FLOOR

ERM collected and composited concrete samples from the Boiler Room floor following the floor cleaning by Americon. The results show that the southern third of the floor (nearest the roll-up door) meets the cleanup goal of 1 ppm. The northern two-thirds of the floor had results in the 1.3 to 6.9 ppm range.

Recommendation: We plan to perform an aggressive recleaning of the area of the floor that did not pass with a different detergent and allow time for the cleaner to soak in before scrubbing. Following the recleaning we will resample the portion of the floor that has not already met the cleanup goal using the same confirmation sample grid proposed in the original work plan.

Prior to the cleanup, totes, drums, and other miscellaneous materials were stored in the Boiler Room. When these materials were removed during the cleanup, two floor drains were identified.

The EPA collected samples from within each of the two floor drains in the Boiler Room. The drain closest to the roll-up door consists of a sump in the floor with a pipeline leading from the sump in the direction of the drain near the center of the room. The drain near the center of the room has a pipe leading straight down for several inches. After several inches, the pipe is obstructed and it is unclear whether the pipe continues downward, turns, or is grouted.

For the drain closest to the roll-up door (sample BRD1), the EPA collected a sample of the dirt in the sump. The result was 5.62 ppm PCBs. For the drain in the center of the room (sample BRD2), the EPA collected a sample of the debris that was in the pipe below approximately three inches of water. The debris appeared to be rusty metal flakes. The result was 20.1 ppm PCBs. According to the UID, floor drains in the UID buildings previously led to a site wastewater treatment system. The system has since been removed, and the UID stated that the lines from the buildings have been grouted closed. ERM was unable to confirm in the field that the lines are grouted.

Recommendation: It appears, based on concrete cuts (and repairs) in the floor that the pipe that leads from the drain sump near the roll-up door connects to the drain near the center of the room. It is unclear where the drain in the center of the room leads. ERM intends to clean out as much of the dirt as possible in the drain sump near the roll-up door and then snake both drains to confirm whether the lines are grouted, as stated by the UID.

If ERM is able to confirm that the line from the drain near the center of the room is grouted to a point below the floor level, we will clean the drains and the pipeline between them by pressure washer and remove as much grit and debris as possible. ERM will pour additional grout to close the drains off to the floor level.

If ERM is unable to confirm that the line from the drain is grouted, we will remove the material from the drain and pipeline to the extent possible without introducing additional water. ERM will then pour a grout seal to prevent future movement of material in the lines.

In either scenario, the lines will be filled with grout to the floor level. If PCBs do remain along the interior surface of the pipes, they will no longer be mobile or accessible. ERM does not intend to collect any samples from the drains.

3.4 *COMPRESSOR ROOM FLOOR DRAINS*

When the oil/water separator was removed from the Compressor Room, a floor drain was observed to be located behind the former oil/water separator location. ERM collected a sample of the oil and absorbent on the floor of the Compressor Room. The result was 57 ppm PCBs. The EPA also collected a sample of the oil and absorbent on the floor of the Compressor Room. The result was 55.2 ppm PCBs.

The floor drain in the Compressor Room has a pipe leading straight down for several inches before it is blocked with debris. The EPA collected a sample of the debris from the floor drain; the debris appeared to be a mix of dirt, absorbent, and possibly some oil. The result was 48.4 ppm PCBs. Because the pipe is obstructed, ERM was unable to confirm in the field whether the line is grouted, as indicated by the UID.

Recommendation: We plan to remove the debris from the Compressor Room floor and perform an aggressive cleaning of the concrete around the former oil/water separator. Following the floor cleaning we will sample the accessible areas of the floor (without removing the other equipment in the room) using a 1.5 meter sampling grid and compositing up to nine sample points into a single composite sample.

Prior to the cleaning, we will snake the drain to determine whether it is grouted. If the drain is grouted, we will clean it by pressure washer to remove the debris above the grout seal to the extent practicable. If ERM is unable to confirm that the drain is grouted, we will remove debris from the drain to the extent practicable without introducing additional water. ERM will then pour a grout seal to prevent future movement of material in the line.

In either scenario, the line will be filled with grout to the floor level. If PCBs do remain along the interior surface of the pipes, they will no longer be mobile or accessible. ERM does not intend to collect any samples from the drain.

3.5

PARKING LOT - FORMER TOTE STORAGE LOCATION

A concrete sample (composite of 4 individual samples on a three meter grid) was taken by ERM from the parking lot in the area of the former tote storage (TS-1). This sample was taken at the request of Cheryl Turcotte of the EPA. The result was 2.7 ppm PCBs. The EPA collected a sample of soil from the seam in the concrete in this same area (OS-1). The result was 21 ppm PCBs.

Recommendation: We plan to remove the soil from the seam in the concrete using a pressure washer and then clean the concrete in the area. We will take one confirmation sample of the concrete by sampling four points on a three meter grid and compositing the four samples. The confirmation sampling grid will be moved one meter north and one meter east from the original sample location. Because the soil will be removed from the seam through the cleaning, there will be no soil remaining and no soil confirmation sampling in this area.

3.6

PARKING LOT - FORMER MP ENVIRONMENTAL BIN STORAGE LOCATION

A concrete sample (composite of 3 individual samples) was taken from the parking lot in the area of the former MP Environmental bin (SW-1). This sample was taken at the request of Cheryl Turcotte of the EPA where historical photos showed plastic totes of oily absorbent outside the bin. The result was 0.30 ppm PCBs (meets the cleanup goal). The EPA also collected a sample of soil from the seam in the concrete in this same area, near the roll-up door to the boiler room (OS-2). The result was 114 ppm PCBs.

Recommendation: We recommend removing the soil from the seam in the concrete. Because the soil will be removed from the seam through the cleaning, there will be no soil remaining and no need to take a soil confirmation sampling in this area.

3.7

RAILROAD TRACKS

The EPA collected a sample of soil (OS-3) from between the parking lot retaining wall and the railroad tracks on the west side of the Burly Seal parking area. The sample location was approximately 11.5 feet west and 28 feet south of the southwest corner of the building, and directly west of the general vicinity of the former location of the MP Environmental bin.

The result was 500 ppm PCBs. The source of the PCBs in this area is not known.

Recommendation: We recommend performing additional characterization sampling in the area around Sample OS-3 to determine whether this result is representative of general elevated PCB levels or is an isolated hot spot. To further characterize the area, we propose to resample at location OS-3, and collect three discrete samples from the concrete in the parking lot near OS-3 and 14 soil samples from the railroad track area in accordance with regulatory requirements for PCB characterization. The samples will be spaced three meters apart as shown on Figure 4.

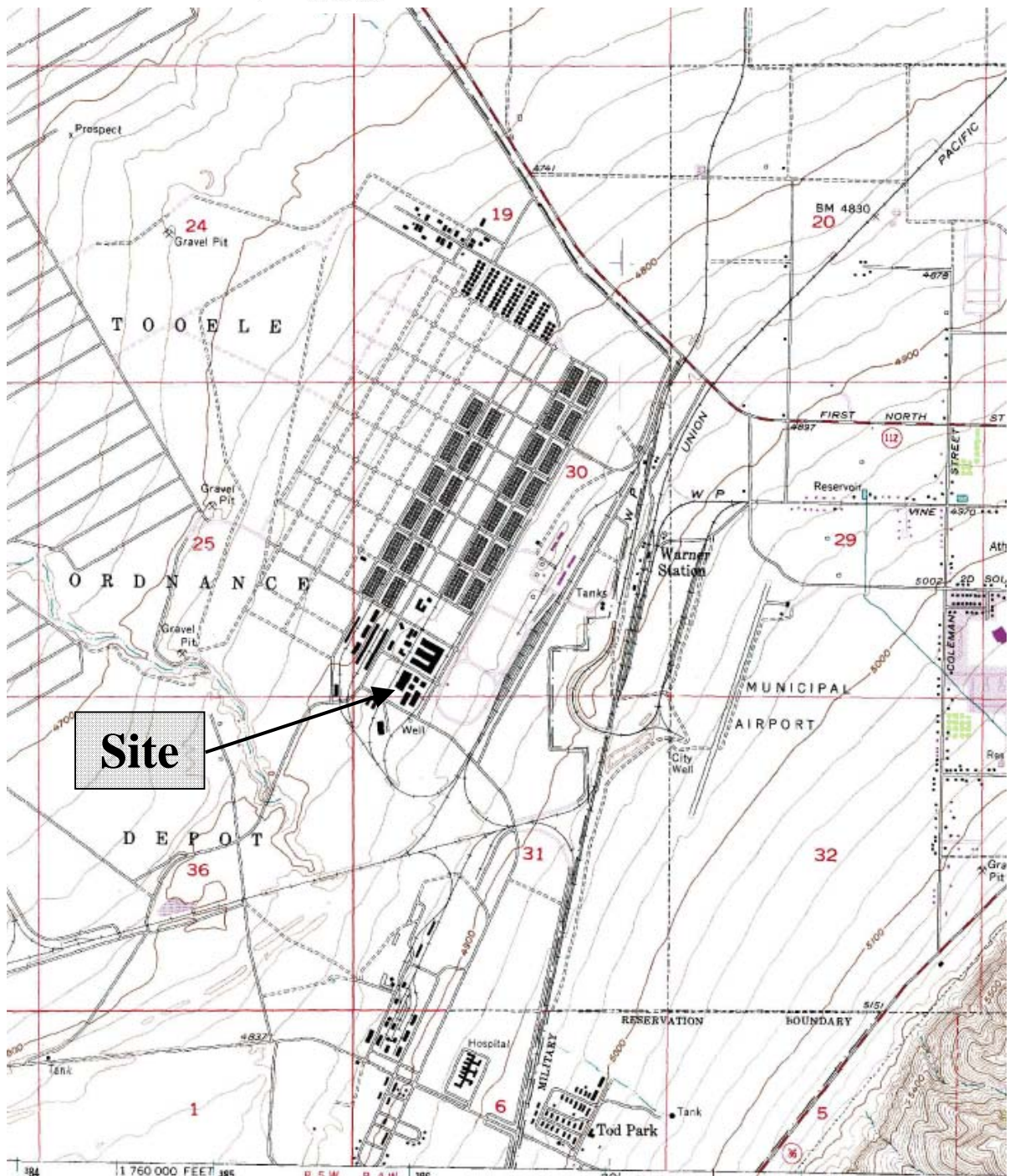
ERM will review the results to determine whether the extent of the PCBs and the source of the PCBs can be identified. Additional actions will depend on results from this sample collection and analysis event. If PCBs are localized and likely the result of Burly Seal activities, soil with PCBs greater than the cleanup level will be removed and confirmation sampling will be performed. If the extent of soil with PCBs greater than 1 ppm is significant, or if PCBs appear to be related to historical activities, ERM and Burly Seal will discuss the results with the EPA to determine further action.

A brief summary of the remaining tasks and estimated start dates is included below:

- Additional characterization sampling (concrete and soil) around the railroad tracks and EPA sample OS-3: May 23, 2012
- Americon can remobilize within 2 weeks of EPA approval of this Addendum to complete the following:
 - Floor drain investigation, cleaning, grouting
 - Press Room concrete slab removal
 - Boiler Room floor recleaning
 - Compressor Room floor cleaning
 - Parking lot former tote storage area concrete cleaning
 - Parking lot removal of dirt in pavement seams
- Following completion of the tasks by Americon, ERM will commence the following confirmation sampling activities:
 - Confirmation sampling of soil beneath Press Room floor
 - Confirmation sampling of Boiler Room floor areas that previously did not meet the cleanup level
 - Confirmation sampling of Compressor Room concrete floor
 - Confirmation sampling of former tote storage area concrete

It is anticipated that the above activities can be completed by July 15, 2012. However, based on the results of the railroad area characterization sampling and the verification sampling, additional work may be required to meet the cleanup goals. ERM will contact the EPA when the results are available to discuss whether additional work will be required, and if so, the proposed schedule. If the characterization and verification sampling show that the cleanup is complete, a cleanup report will be prepared and submitted to the EPA within two months of receiving the final sample results.

Figures



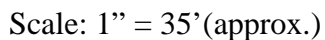
Source: USGS 1:24,000 Scale Topographic Map,
Tooele Quadrangle

Environmental Resources Management
102 West 500 South, Suite 650
Salt Lake City, Utah 84102
801-595-8400

Figure 1- Site Location Map
Burly Seal
1865 West D Avenue, Building 604
Tooele, Utah

Drawn By: TRP
Checked By:
Date: 4/5/2011

Project No. 0146470



<p align="center">Source: Burly Seal Provided Plot Plan (Reported to have come from UID)</p>	<p align="center">Environmental Resources Management 102 West 500 South, Suite 650 Salt Lake City, Utah 84102 801-595-8400</p>	
<p align="center">Figure 2- Former PCB Containing Equipment and Material Locations Burly Seal - 1865 West D Avenue, Building 604 Tooele, Utah</p>	<p>Drawn By: TRP Checked By: Date: 4/5/2011</p>	<p align="center">Project No. 0146470</p>

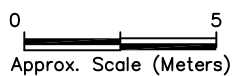
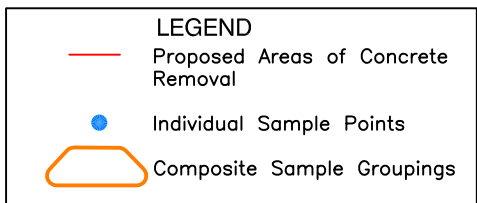
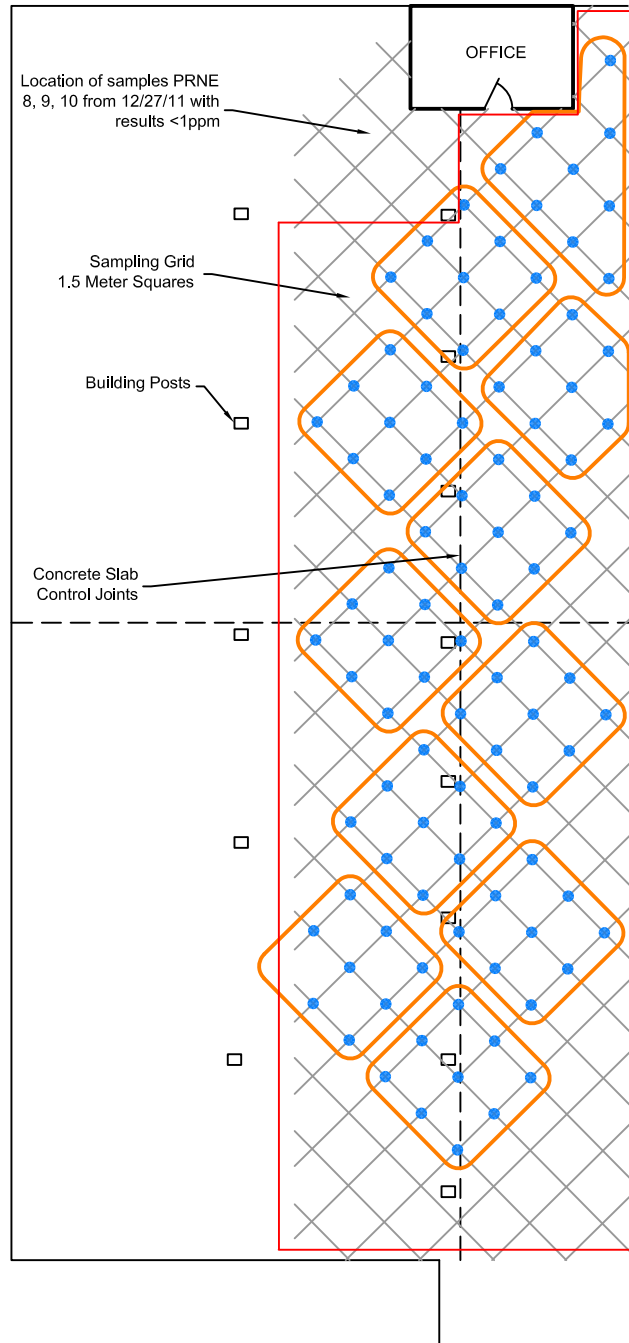


Figure 3
*Proposed Verification Sampling Locations - Press Room
 Burly Seal - 1865 West D Avenue, Building 604
 Tooele, Utan*

- Location original OS-3 soil sample
- Additional soil samples
- Concrete samples (parking lot level)

North ↑



Source: maps.google.com

Environmental Resources Management

102 West 500 South, Suite 650
Salt Lake City, Utah 84102
801-595-8400

**Figure 4 - Proposed Additional Characterization Samples,
Railroad Tracks Area
Burly Seal - 1865 West D Avenue, Building 604
Tooele, Utah**

Drawn By: TRP
Checked By:
Date: 4/18/12

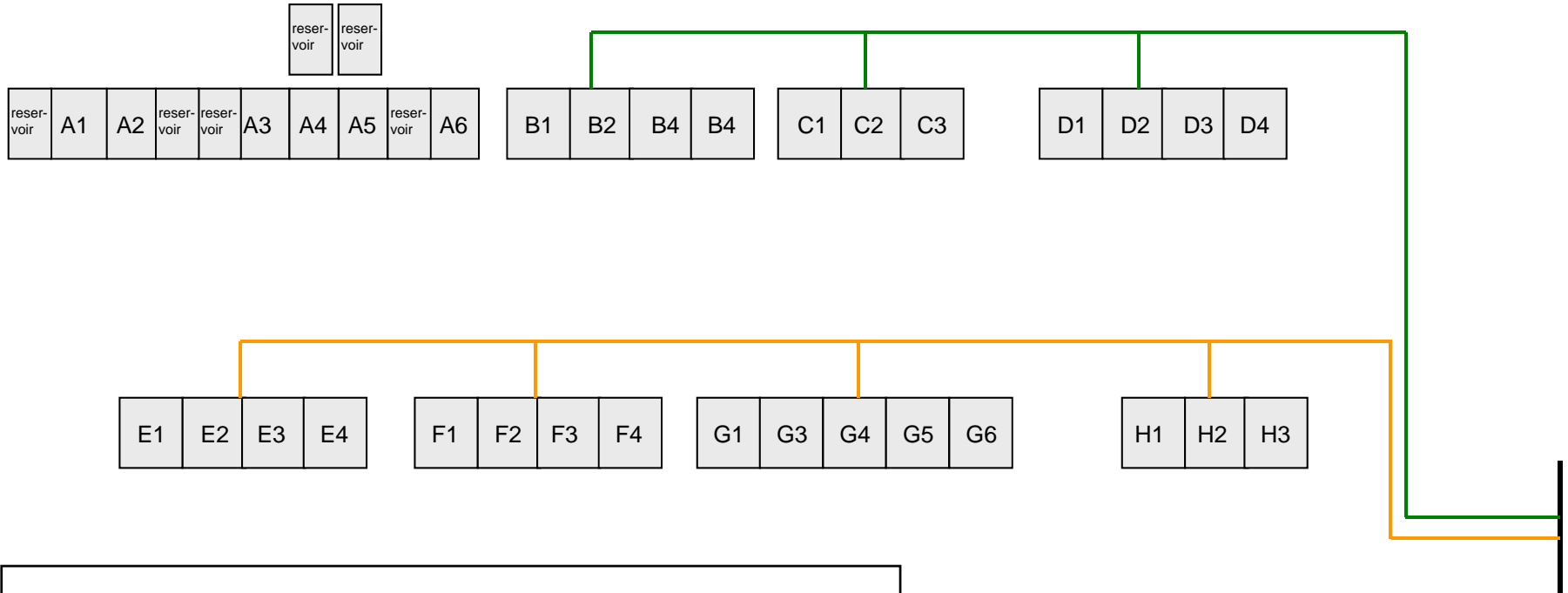
Project No. 0146470

Appendix A
Schematic of Removed Press System Equipment

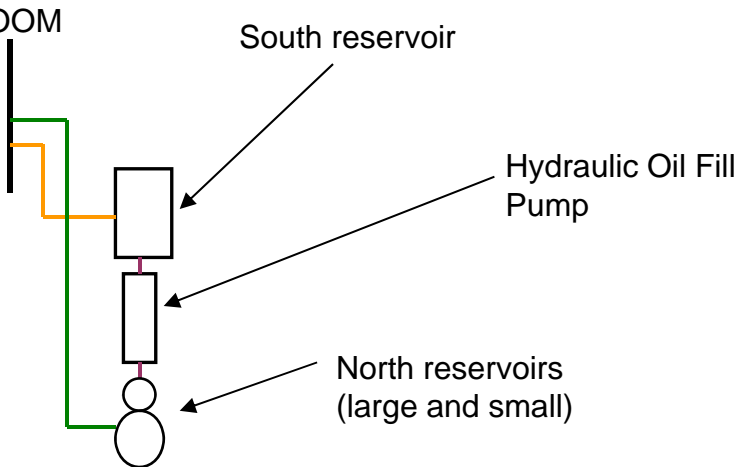
HYDRAULIC PRESS EQUIPMENT

Burly Seals – Tooele, Utah

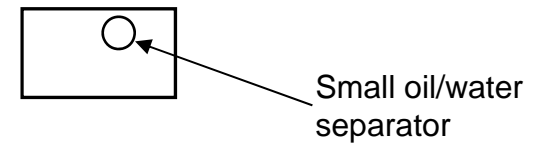
PRESS ROOM



BOILER ROOM

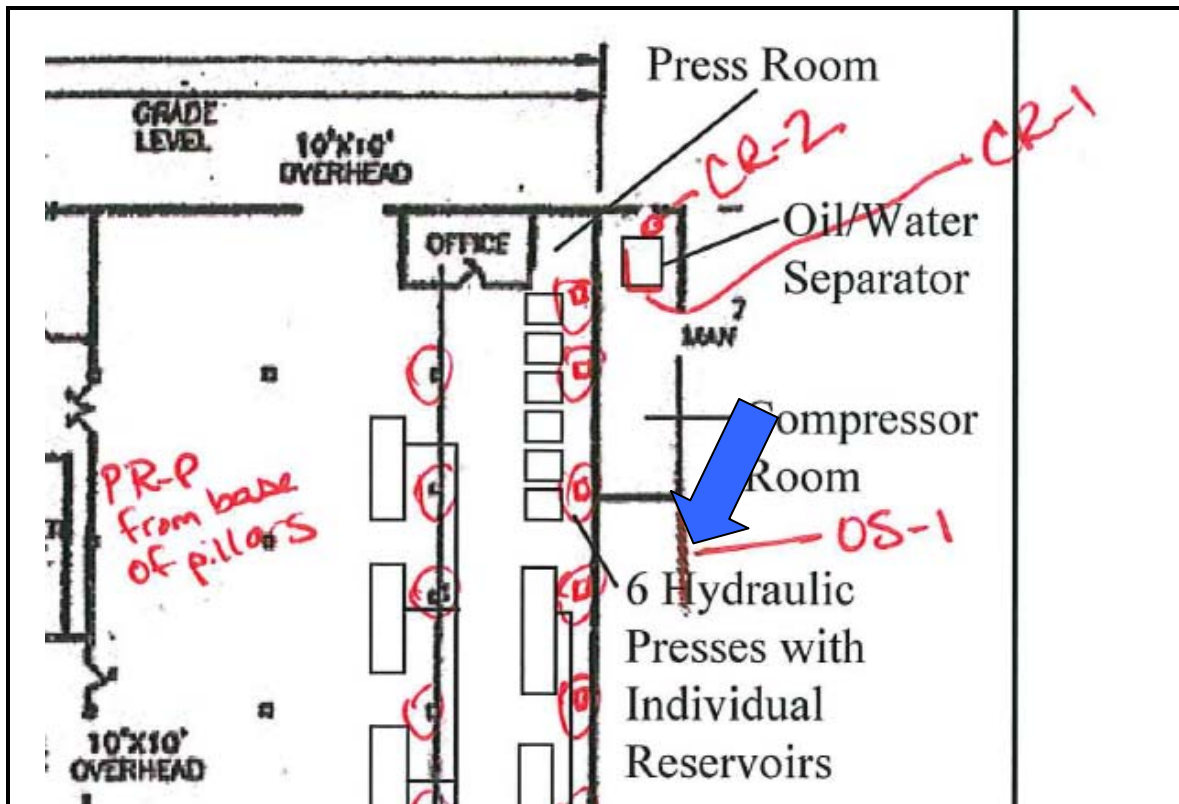


COMPRESSOR ROOM

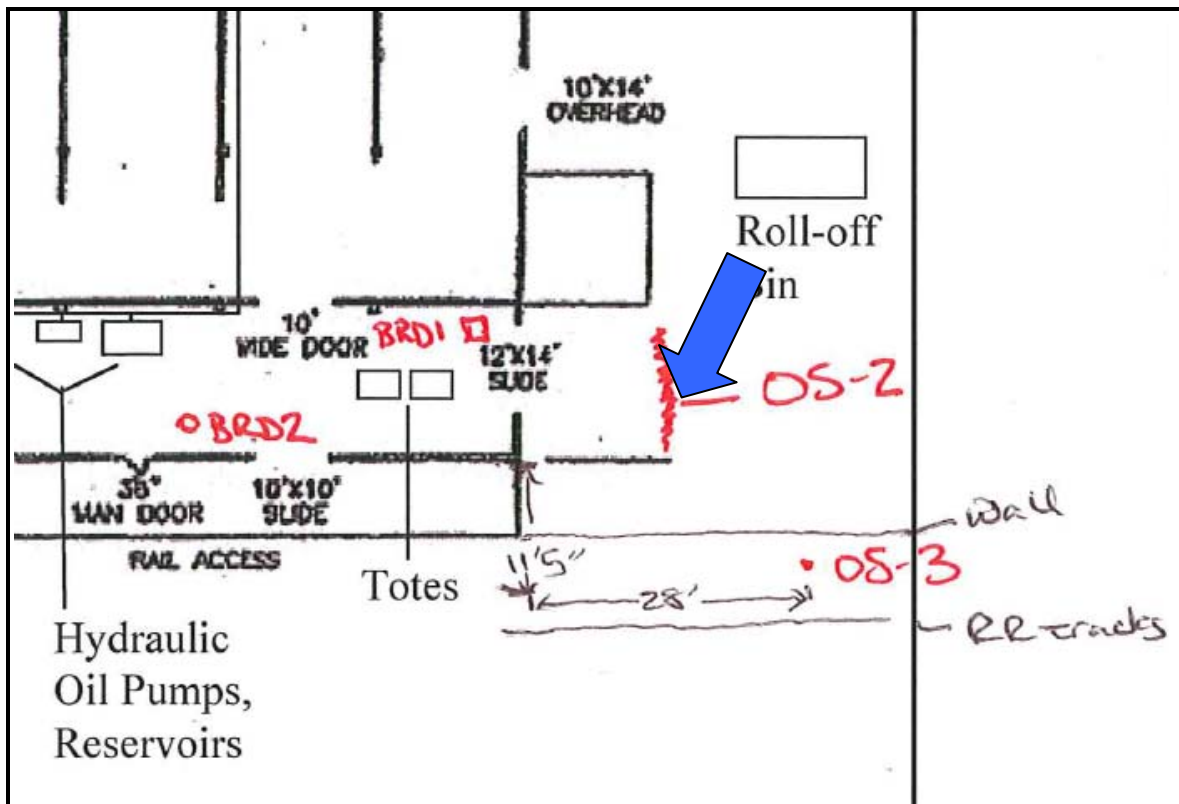


Appendix B
December 2011 Sampling Locations

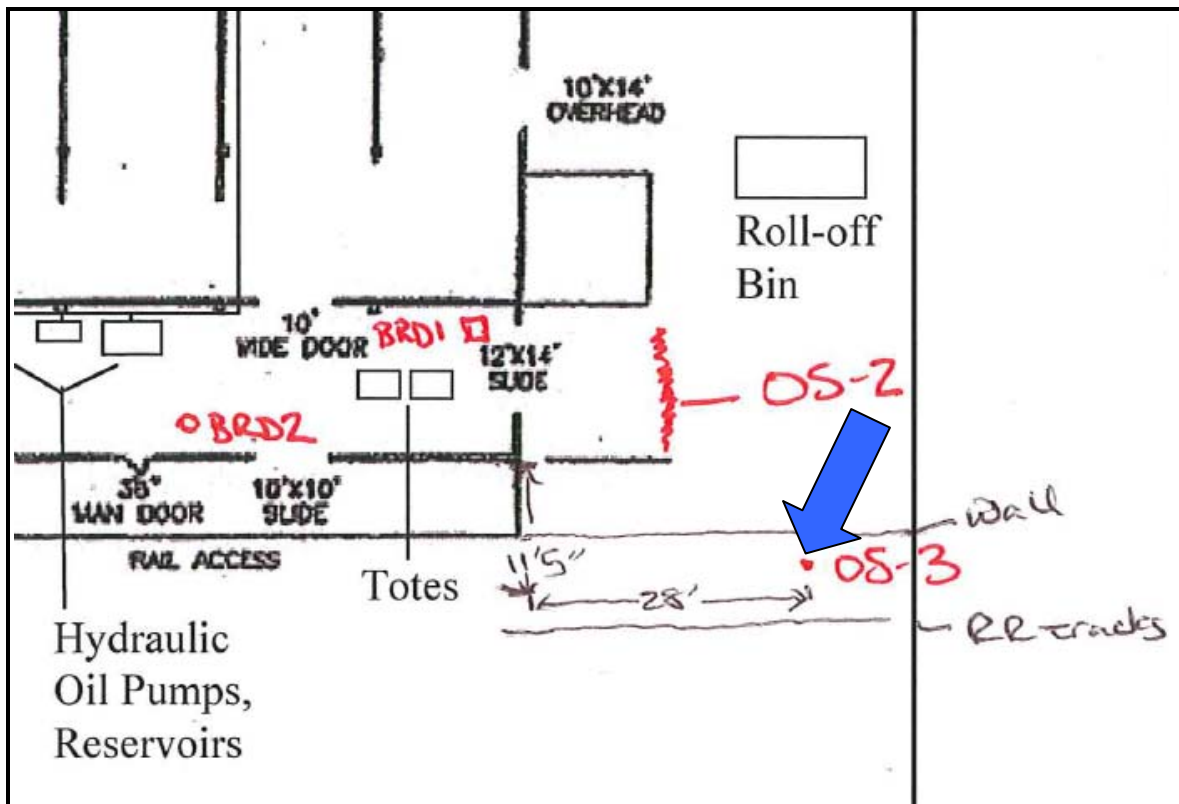
Sample OS-1
21 ppm
Collected by EPA 12-20-11



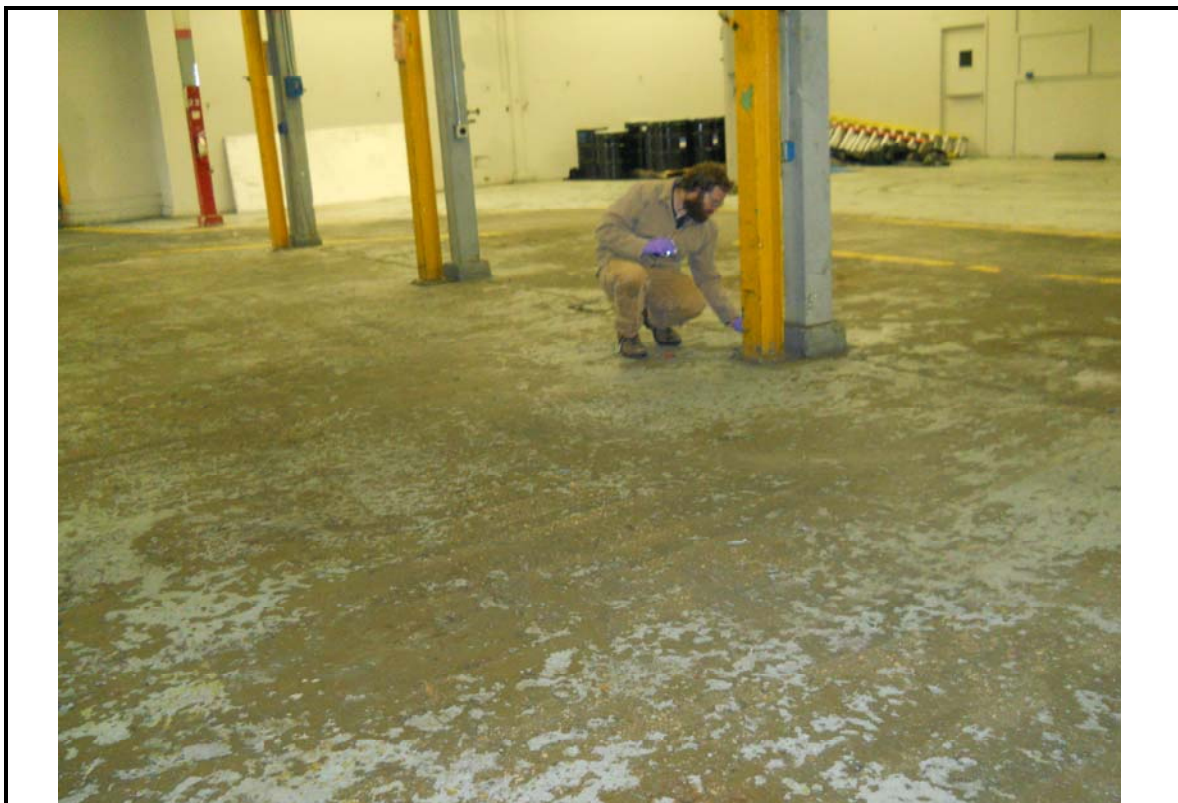
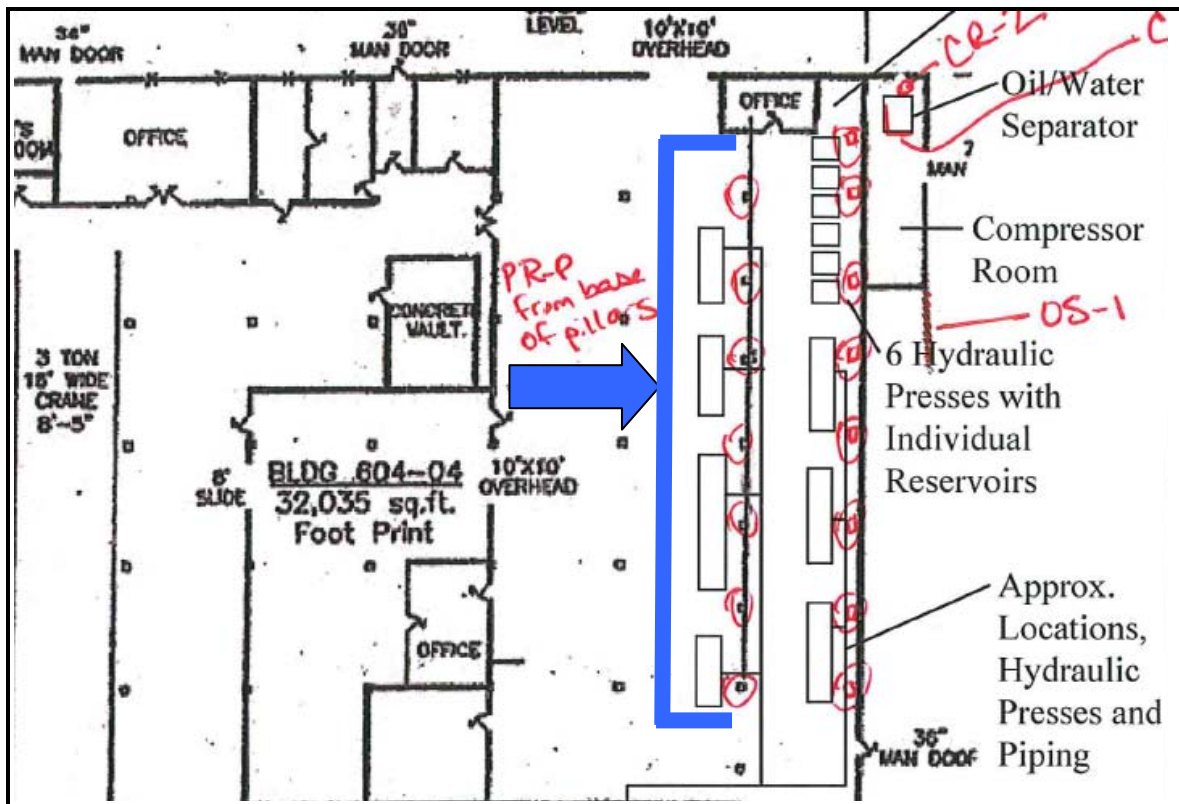
Sample OS-2
114 ppm
Collected by EPA 12-20-11



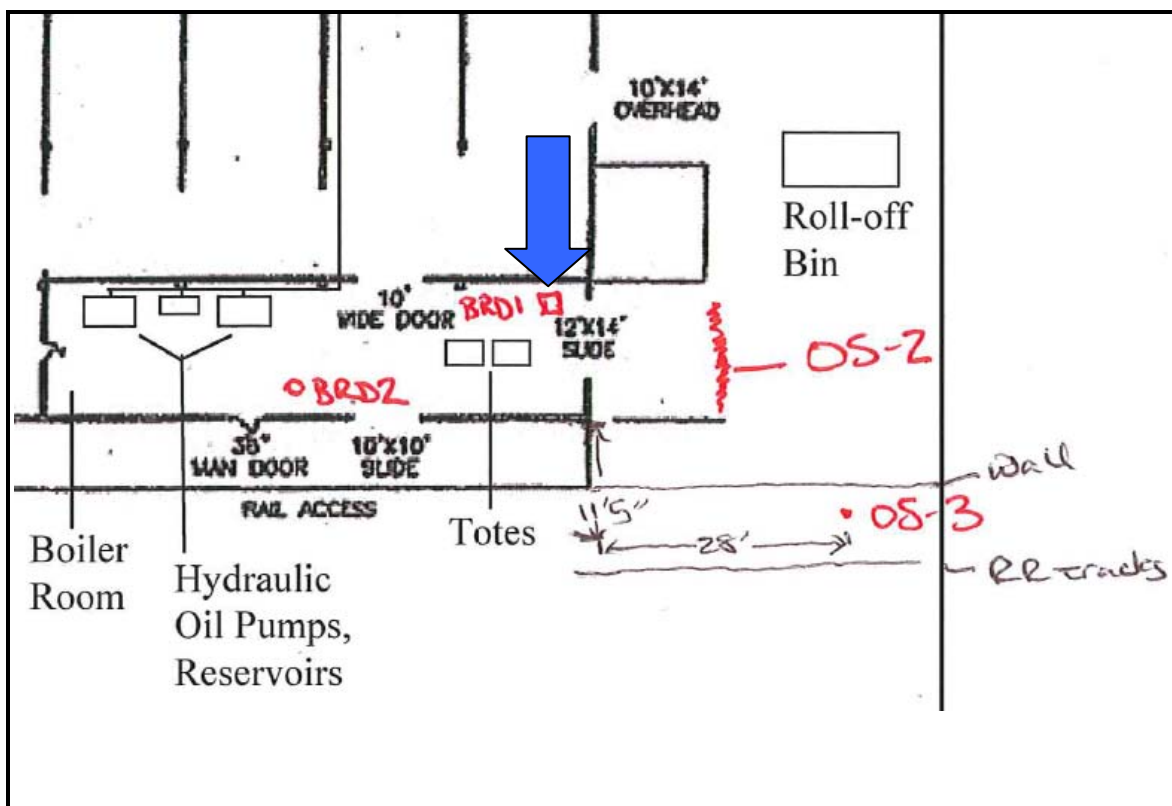
Sample OS-3
500 ppm
Collected by EPA 12-20-11



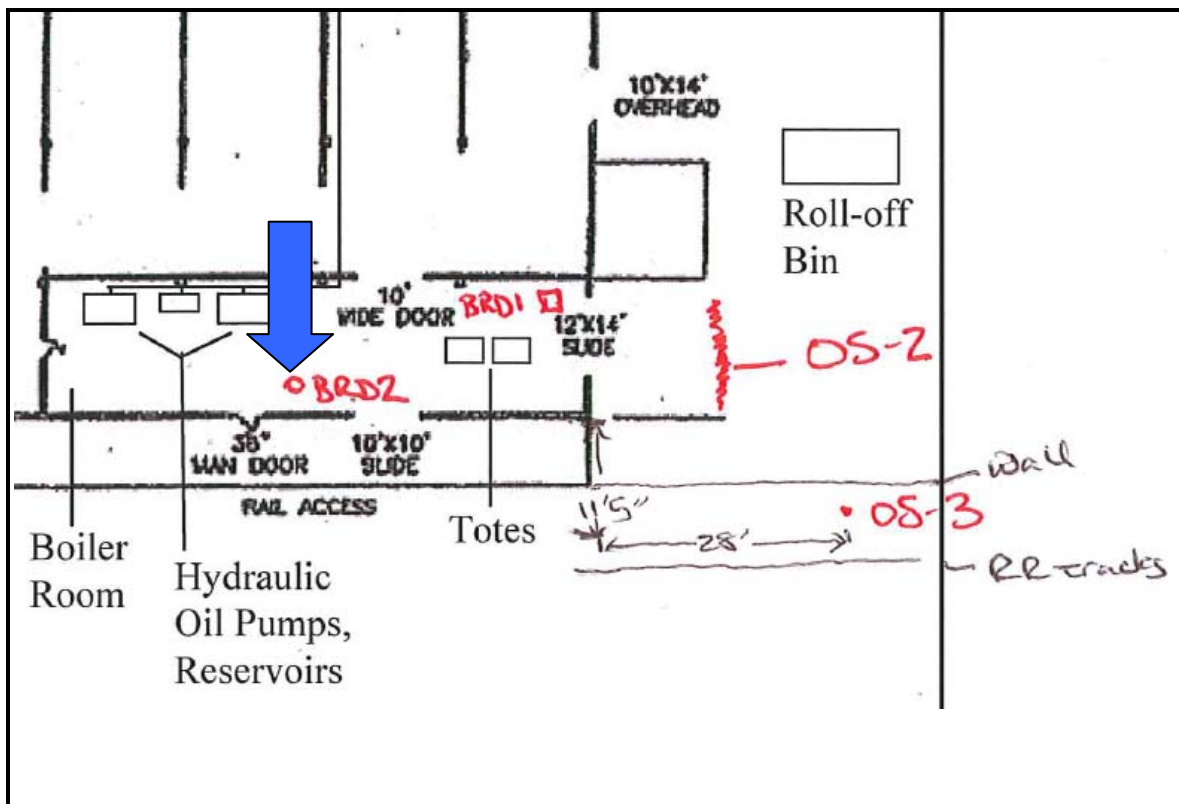
Sample PR-P
72.4 ppm
Collected by EPA 12-20-11



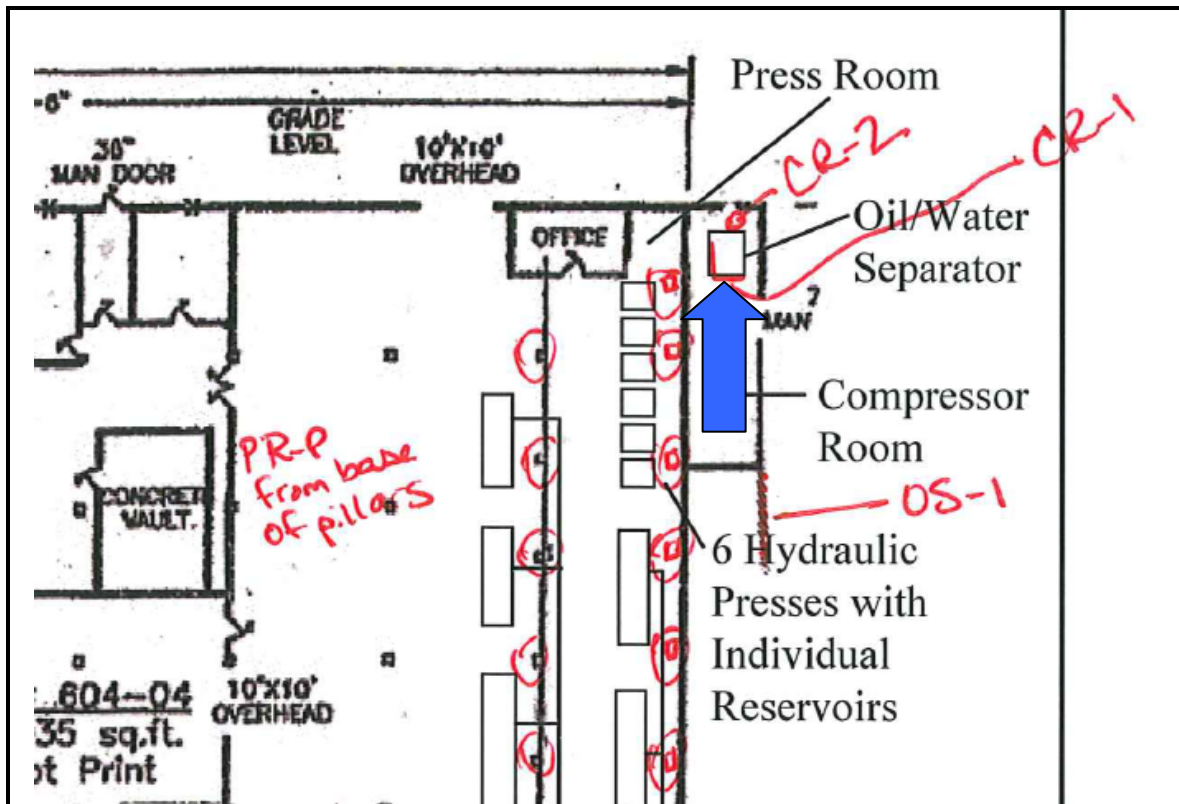
Sample BRD1
5.62 ppm
Collected by EPA 12-20-11



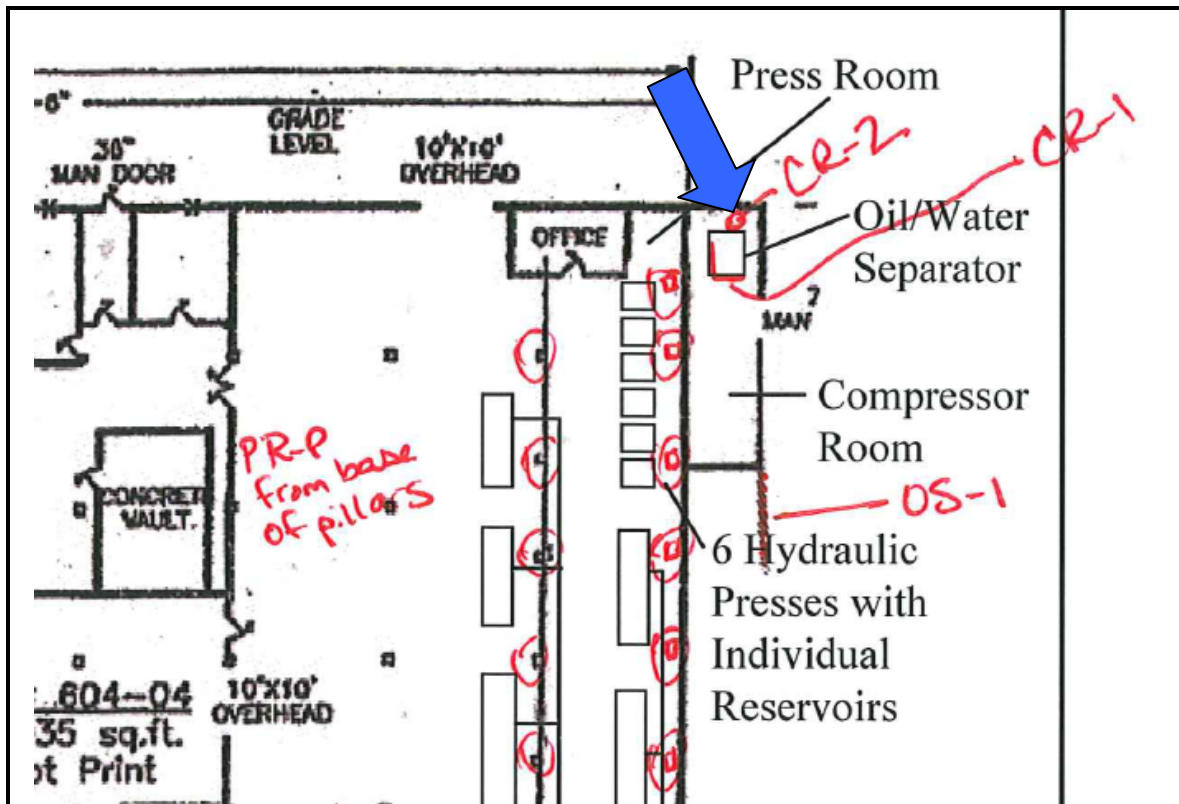
Sample BRD2
20.1 ppm
Collected by EPA 12-20-11



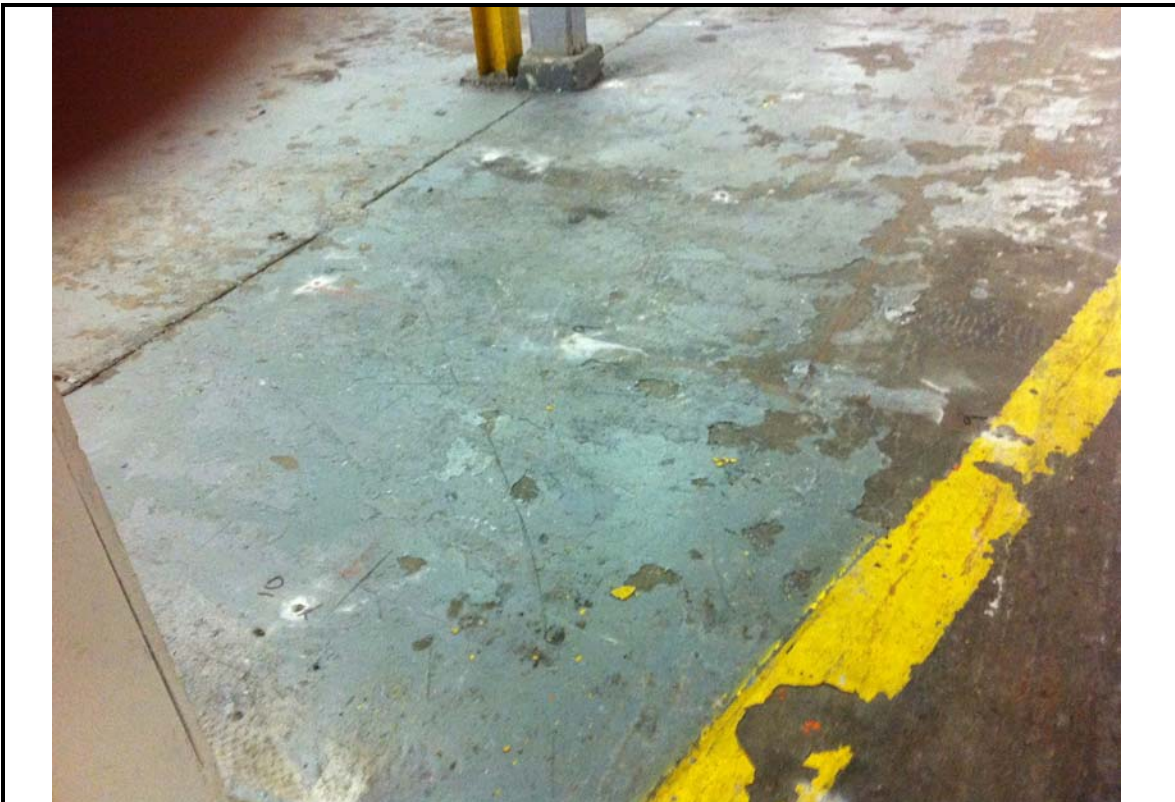
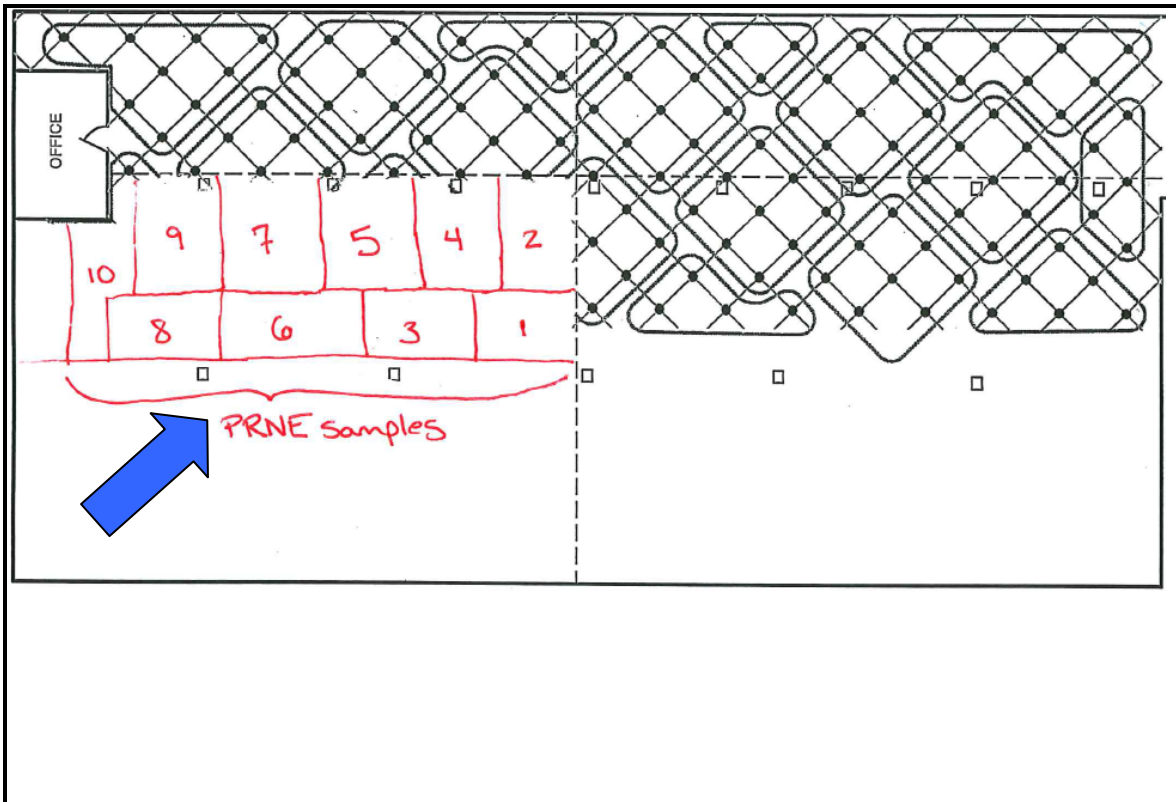
Sample CR-1
55.2 ppm
Collected by EPA 12-20-11



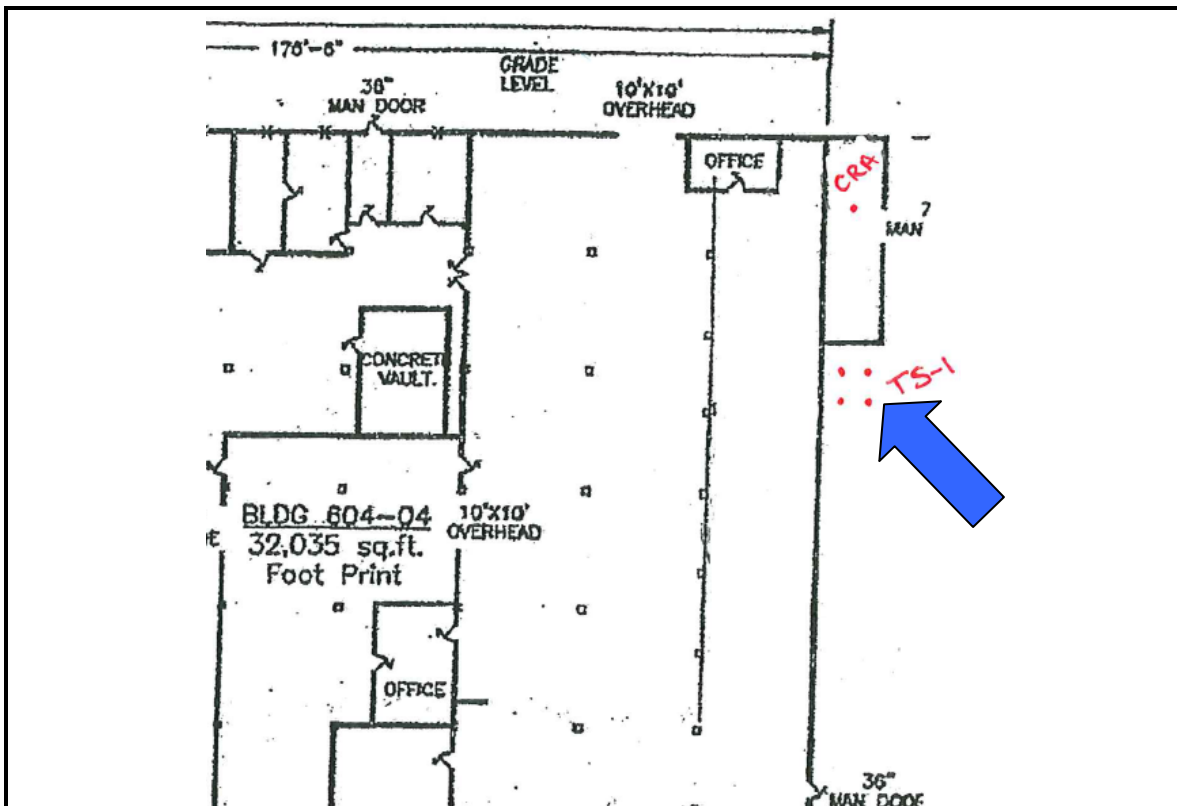
Sample CR-2
48.4 ppm
Collected by EPA 12-20-11



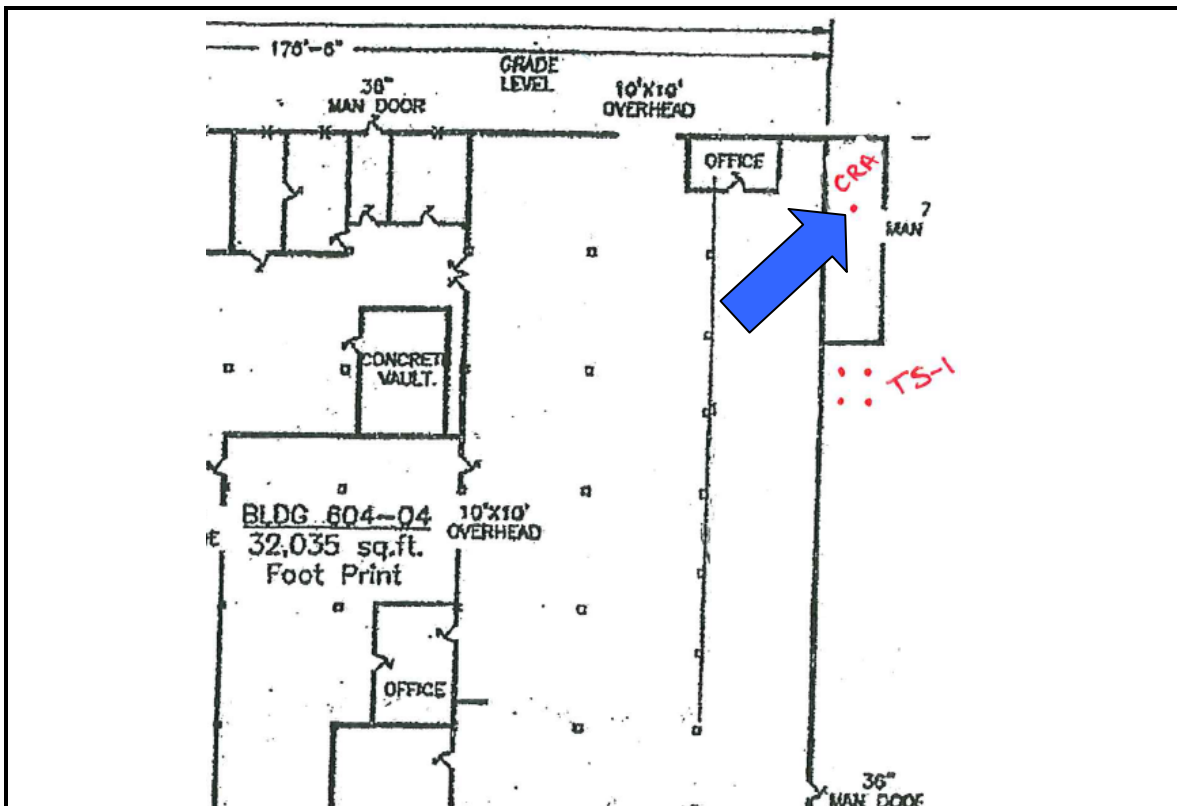
Sample PRNE-1 - PRNE-10
0.15 to 71 ppm (see Table 1)
Collected by ERM 12-27-11



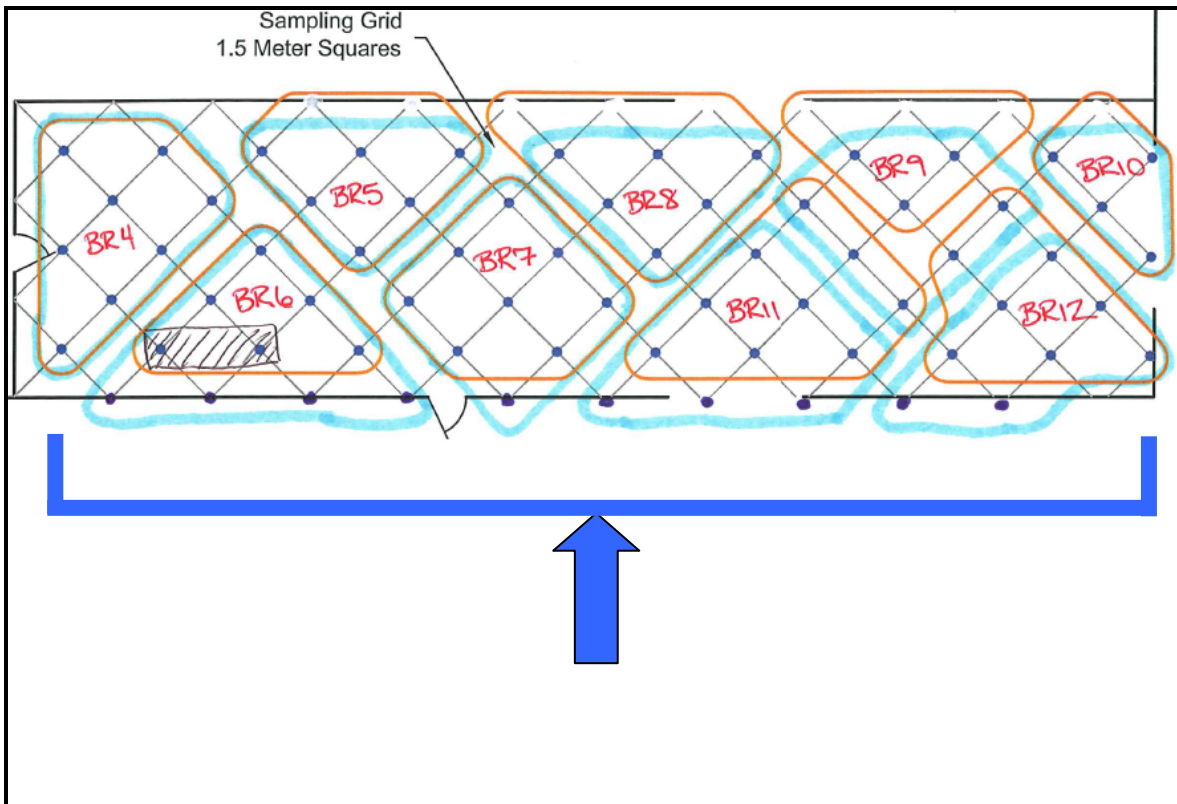
Sample TS-1
2.7 ppm
Collected by ERM 12-27-11



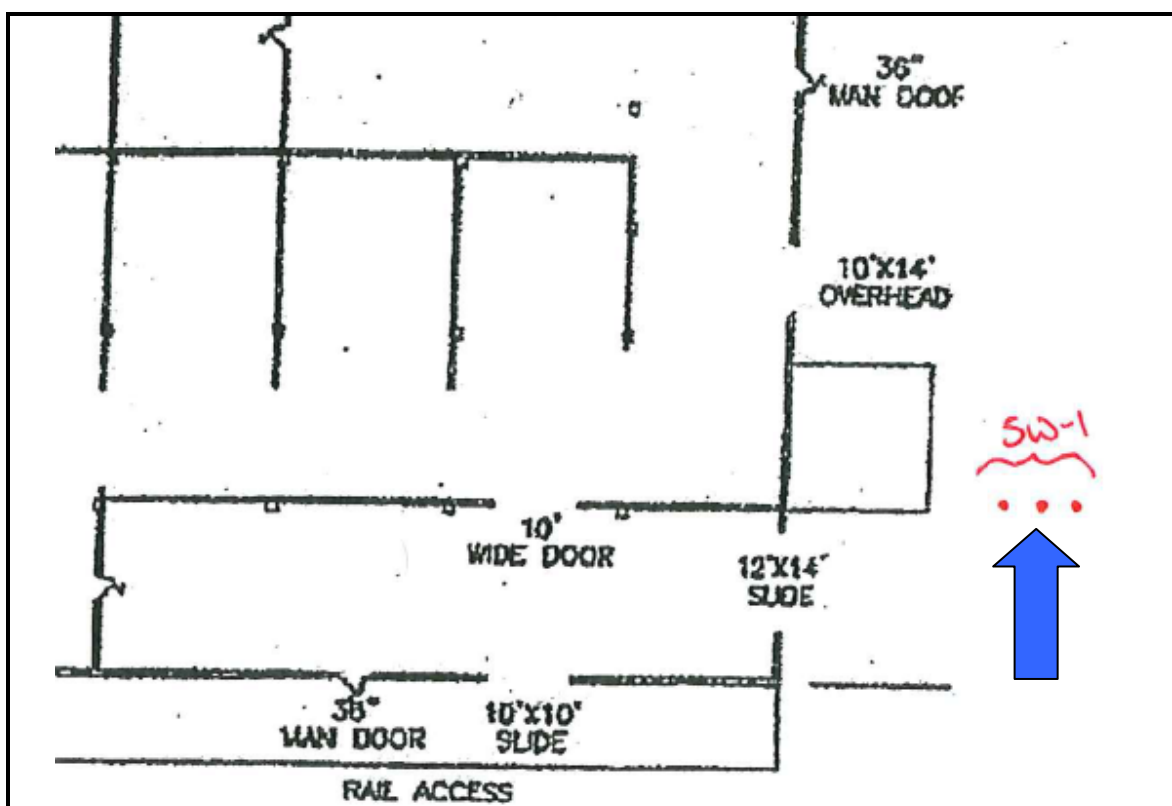
Sample CRA
57 ppm
Collected by ERM 12-27-11



Sample BR-4 - BR-12
0.31 to 6.9 ppm
Collected by ERM 12-30-11



Sample SW-1
0.30 ppm
Collected by ERM 12-30-11



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